

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION - Detroit

IN THE MATTER OF:

CITY OF DETROIT, MICHIGAN

Debtor.

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Chapter 9  
Case No. 13-53846  
Judge Thomas J. Tucker

**JACKIE'S TRANSPORT, INC.'S RESPONSE TO  
DEBTOR'S TWELFTH OMNIBUS OBJECTION TO CERTAIN CLAIMS**

Jackie's Transport, Inc., by and through its counsel, OSIPOV BIGELMAN, P.C., responds to Debtor's Twelfth Omnibus Objection to Certain Claims as follows:

1. The allegations of paragraph one (1) are admitted.
2. The allegations of paragraph two (2) are admitted.
3. The allegations of paragraph three (3) are admitted.
4. The allegations of paragraph four (4) are admitted.
5. The allegations of paragraph five (5) are admitted.
6. The allegations of paragraph six (6) are admitted.
7. The allegations of paragraph seven (7) are admitted.
8. The allegations of paragraph eight (8) are denied as stated. On February 18, 2014, undersigned counsel caused a copy of the proof of claim for Jackie's Transport, Inc., a copy of which is attached hereto, to be sent by first class mail to the Debtor's claims agent. The manner and speed at which the claims agent chose to process the claim documents does not create a basis for disallowance of the claim.
9. The allegations of paragraph nine (9) are denied as stated. On February 18, 2014, undersigned counsel caused a copy of the proof of claim for Jackie's Transport, Inc., a copy of which is attached hereto, to be sent by first class mail to the Debtor's claims agent.

The manner and speed at which the claims agent chose to process the claim documents does not create a basis for disallowance of the claim.

10. The allegations of paragraph ten (10) are admitted.

11. The allegations of paragraph eleven (11) are admitted.

12. The allegations of paragraph twelve (12) are admitted.

13. The allegations of paragraph thirteen (13) are denied as it applies to the timeliness of the claim filed by Jackie's Transport, Inc.

14. No response required as averment is a legal conclusion. To the extent that any response is necessary, Jackie's Transport, Inc. neither admits nor denies the averment.

15. No response required as averment is a legal conclusion. To the extent that any response is necessary, Jackie's Transport, Inc. neither admits nor denies the averment.

16. No response required as averment is a legal conclusion. To the extent that any response is necessary, Jackie's Transport, Inc. neither admits nor denies the averment.

17. No response required as averment is a legal conclusion. To the extent that any response is necessary, Jackie's Transport, Inc. neither admits nor denies the averment.

WHEREFORE, Jackie's Transport, Inc. respectfully requests that this Court overrule the Debtor's objection to its proof of claim and grant all other relief as this Court deems just.

Respectfully submitted,

**OSIPOV BIGELMAN, P.C.**

Dated: April 27, 2015

/s/ William C. Blasses

YULIY OSIPOV (P59486)

WILLIAM C. BLASSES (P73945)

Attorneys for Jackie's Transport, Inc.

20700 Civic Center Drive, Suite 420

Southfield, MI 48076

(248) 663-1800

[wcb@osbig.com](mailto:wcb@osbig.com), [yo@osbig.com](mailto:yo@osbig.com)

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 27, 2015, I electronically filed:

- Jackie's Transport, Inc.'s Response to Debtor's Twelfth Omnibus Objection to Certain Claims
- Certificate Of Service

with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

City of Detroit  
c/o John A. Simon  
500 Woodward Ave., Suite 2700  
Detroit, MI 48226

Respectfully submitted,

**OSIPOV BIGELMAN, P.C.**

Dated: April 27, 2015

/s/ William C. Blasses

YULIY OSIPOV (P59486)  
WILLIAM C. BLASSES (P73945)  
Attorneys for Jackie's Transport, Inc.  
20700 Civic Center Drive, Suite 420  
Southfield, MI 48076  
(248) 663-1800  
[wcb@osbig.com](mailto:wcb@osbig.com), [yo@osbig.com](mailto:yo@osbig.com)

